



VAN DER VEEN, HARTSHORN, LEVIN & LINDHEIM

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January 3, 2025

Via E-Filing

Hon. Julien Xavier Neals, U.S.D.J.
United States District Court, District of NJ
MLK Jr. Fed. Bldg. & US Courthouse
50 Walnut St., Courtroom MLK 5D
Newark, NJ 07102

Re: Lunsford v. Rutgers University, et al.
Docket No. 24-4359

Dear Judge Neals,

Please accept this correspondence on behalf of Plaintiff Eric Lunsford in the above-referenced matter. We write to respectfully request a 30-day extension of the discovery deadline in this matter, which is currently set to end on January 27, 2025. Defense counsel has consented to this request. The Parties presently have depositions scheduled for later this month and are engaging in ongoing settlement discussions. As such, we respectfully submit that a 30-day extension would be appropriate to ensure that the Parties have sufficient time to address any discovery issues that may arise as a result of these depositions. If granted, the new deadlines would be as follows:

1. Fact Discovery: February 26, 2025
2. Affirmative Expert Reports: March 31, 2025
3. Responding Expert Reports: April 29, 2025
4. Expert Discovery Deadline: May 29, 2025

We thank Your Honor for the Court's consideration of this matter.

Sincerely,

/s/ Kaitlin C. McCaffrey

Kaitlin C. McCaffrey

cc: Margaret Raymond-Flood, Esq. (via PACER)
Michael Townsend, Esq. (via PACER)